

Facility Name: **IMERYS Marble, Inc. – Marble Hill Plant**
City: Marble Hill
County: Pickens
AIRS #: 04-13-227-00003

Application #: TV- 589425
Date Application Received: August 9, 2021
Permit No: 1499-227-0003-V-05-0

Program	Review Engineers	Review Managers
SSPP	Brian Zhong	Hamid Yavari
ISMU	Joshua Pittman	Dan McCain
SSCP	Bob Tatum	Stacy Wix
Toxics	n/a	n/a
Permitting Program Manager		Eric Cornwell

Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Facility Identification**

1. Facility Name:

IMERYYS Marble, Inc. – Marble Hill Plant

2. Parent/Holding Company Name

IMERYYS Marble, Inc.

3. Previous and/or Other Name(s)

The facility was previously known as "Georgia Marble Company."

4. Facility Location

9986 State Highway 53 East
Marble Hill, Georgia 30148 (Pickens County)

5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is located in an attainment area.

B. Site Determination

There are no other manufacturing facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
1499-227-0003-V-04-0	February 9, 2017	Title V renewal permit.
Off-Permit Change	June 8, 2017	Replace the Imp Mill Flash Dryer (B79), 5.3 MMBtu/hr, burner with a new one rated at 7.0 MMBtu/hr.
Off-Permit Change	November 28, 2017	Add one conveyor and two storage bins with dust collectors.

D. Process Description

1. SIC Codes(s)

1499

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

This is a calcium stearate coating facility

3. Overall Facility Process Description

Operations conducted at the facility are materials stockpiling, conveying, grinding, flash drying, final product conveying & storage, bulk loading and ancillary support activities.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

This Plant is presently classified as a major stationary source as defined by federal 40 CFR 52.21, Prevention of Significant Air Quality Deterioration (PSD). Specifically, the facility has the potential to emit more than 250 tons per year of particulate matter and PM10 (particulate matter less than or equal to 10 micrometers aerodynamic diameter). However, the company requested removal of several decommissioned process equipment which will lessen its potential to emit enough to make the facility eligible to be reclassified as a minor PSD source (See Table A-1 of Application No. TV-40920).

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	yes	yes	no	no
PM ₁₀	yes	yes	no	no
PM _{2.5}	yes	yes	no	no
SO ₂	yes	no	no	yes
VOC	yes	no	no	yes
NO _x	yes	no	no	yes
CO	yes	no	no	yes
TRS	no	no	no	yes
H ₂ S	no	no	no	yes
Individual HAP	yes	no	no	yes
Total HAPs	yes	no	no	yes

3. MACT Standards

This facility is neither major for HAPs nor subject to any proposed or final MACT Standards.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	no
Program Code 8 – Part 61 NESHAP	no
Program Code 9 - NSPS	yes
Program Code M – Part 63 NESHAP	no
Program Code V – Title V	yes

Regulatory Analysis**II. Facility Wide Requirements****A. Emission and Operating Caps:**

None applicable.

B. Applicable Rules and Regulations

None applicable.

C. Compliance Status

There are no noncompliance issues associated with this Title V renewal permit.

D. Permit Conditions

Facility-wide conditions are included in the permit other are the general provisions in Part VIII of the enclosed permit and Rule 391-3-1-.02(2)(a), which apply to all air contaminant sources.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
Plant 5				
C17	Dump Hopper	391-3-1-.02(2)(e)	N/A	None
C18	Grizzly Feeder	391-3-1-.02(2)(e)	WS	Water Sprays
C19	Screen	391-3-1-.02(2)(e)	WS	Water Sprays
C20	Jaw Crusher	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F50	Water Sprays Baghouse
C24	Belt Conveyor	391-3-1-.02(2)(e)	N/A	None
C27	Belt Conveyor			
C28	Belt Conveyor			
C29	Primary Screen	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	C26	Baghouse
C30	Belt Conveyor	391-3-1-.02(2)(e)	N/A	None
D40	Cone Crusher	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F50	Baghouse
D41	Belt Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	F50	Baghouse
D42	Belt Conveyor			
C32	Offwhite Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F50	Baghouse
D55	Belt Conveyor	391-3-1-.02(2)(e)	N/A	None
C72	Dalton Bin North	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	C26	Baghouse
C68	Belt Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	WS	Water Sprays
C71	Loading Station			
C73	Dalton Bin South	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	C26	Baghouse
C70	Dalton Bin Loading Stations	391-3-1-.02(2)(e)	WS	Water Sprays
C34	Belt Conveyor	391-3-1-.02(2)(e)	N/A	None
C36	Twin Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	C26	Baghouse
C37	Twin Silo			
C39	Belt Conveyor	391-3-1-.02(2)(e)	N/A	None
C40	Belt Conveyor			
C44	Plant 5 - 55 Raymond Mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	C38	Baghouse
C46	Cyclone			
F16	Silo No. 12	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	F15	Bin Vent
F19	Loading Spout	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	F20	Baghouse
F18	Silo No. 11	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	F17	Bin Vent
F21	Loading Spout	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	F22	Baghouse
C47	Silo No. 7	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F02	Baghouse
C69	Belt Conveyor	391-3-1-.02(2)(e)	N/A	None
C48	Silo No. 6	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F02	Baghouse
D44	Loading Spout	391-3-1-.02(2)(e)	N/A	None
D46	Loading Spout	391-3-1-.02(2)(e)		
C49	Silo No. 5	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F02	Baghouse
D51	Packer Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	D50	Baghouse

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
D52	Packer	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)		
C51	Belt Conveyor	391-3-1-.02(2)(e)	N/A	None
C52	Belt Conveyor			
C53	Belt Conveyor			
C54	Belt Conveyor			
C55	Belt Conveyor			
C56	Belt Conveyor			
C33	Belt Conveyor			
D19	Belt Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	N/A	None
D08	Campablo Bin	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	D16	Bin Vent
D07	Campablo Bin Loading Spouts	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	N/A	None
C41	Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	D50	Baghouse
D54	Belt Conveyor	391-3-1-.02(2)(e)	N/A	None
C42	Plant 5 - 54 Raymond Mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	C43	Baghouse
C45	Cyclone	391-3-1-.02(2)(e)	N/A	None
F10	Belt Conveyor	391-3-1-.02(2)(e)		
C75	Canica Feed Silo	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	C88	Baghouse
D56	Belt Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	N/A	None
F12	Bucket Elevator	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	C88	Baghouse
F13	Belt Conveyor	391-3-1-.02(2)(e)	N/A	None
E89	Rotary Dryer	40 CFR 52.21 Avoidance 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	E94	Baghouse
E90	Belt Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	N/A	None
E91	Bucket Elevator	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	E93	Baghouse
E92	Surge Bin			
E95	Belt Conveyor			
C96	Belt Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	N/A	None
C97	Canica Impact Mill			
C94	Bucket Elevator	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	C88	Baghouse
F23	Screen	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	N/A	None
F24	Screen			
F26	Bin	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	F44	Baghouse
C87	Separator	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	C88	Baghouse
F27	Separator			
C83	Bucket Elevator	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	C88	Baghouse
F31	Bin	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	F44	Baghouse
F32	Magnetic Separator	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F44	Baghouse
F33	Magnetic Separator			
F34	Magnetic Separator			
D06	Reject Bin Loading Station	391-3-1-.02(2)(e)	N/A	None

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
C61	40-200 Bins	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	E96	Bin Vent
C63	40-200 Bins	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	E97	Bin Vent
C64	40-200 Bins	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	E98	Bin Vent
F37	Bin	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	F39	Bin Vent
C59	Marblend Bagger Bin	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	D50	Baghouse
C60	Marblend Bagger			
F11	Belt Conveyor	391-3-1-.02(2)(e)	N/A	None
C74	Zero Mill Feed Silo	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	C88	Baghouse
D57	Belt Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	N/A	None
C35	Belt Conveyor	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	DC537	Baghouse
C100	Belt Conveyor			
D22	Plant 5 - 51 Raymond Mill	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	D23	Baghouse
D27	Plant 5 - 52 Raymond Mill	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	D24	Baghouse
D28	Plant 5 - 53 Raymond Mill	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	D25	Baghouse
D29	Cyclone	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	D23	Baghouse
D30	Cyclone	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	D24	Baghouse
D31	Cyclone	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	D25	Baghouse
D37	Silo No. 8	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	DC65	Bin Bent
D62	Loading Spout	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	E99	Baghouse
D60	Silo No. 9	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	DC66	Bin Vent
D63	Loading Spout	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	E99	Baghouse
D61	Silo No. 10	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	E99	Baghouse
D64	Loading Spout	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	E99	Baghouse
D20	Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	D36	Baghouse
D21	Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	D36	Baghouse
D35	Loading Station	391-3-1-.02(2)(e)	N/A	None
D34	Loading Station	391-3-1-.02(2)(e)	N/A	None
D32	Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	D36	Baghouse
D33	Loading Station			
D15	No. 1 Rail Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	D18	Bin Vent
D02	No. 1 Rail Bin Loading Station	391-3-1-.02(2)(e)	N/A	None
D14	No. 2 Rail Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	D36	Baghouse
D03	No. 2 Rail Bin Loading Station	391-3-1-.02(2)(e)	N/A	None

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
D13	No. 3 Rail Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	D17	Baghouse
D04	No. 3 Rail Bin Loading Station	391-3-1-.02(2)(e)	N/A	None
D12	No. 4 Rail Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	D17	Baghouse
D05	No. 4 Rail Bin Loading Station	391-3-1-.02(2)(e)	N/A	None
C99	Semi-bulk Bagger	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	D50	Baghouse
RM56	Plant 5 - 56 Raymond Mill	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	DC56	Baghouse
RM57	Plant 5 - 57 Raymond Mill	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	DC57	Baghouse
Plant 6				
A01	Dump Hopper	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	A02	Baghouse
A03	Belt Conveyor			
A04	Belt Conveyor			
A05	Feed Silo			
CV63	Belt Conveyor CV63	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	DC623	Baghouse
A06	Feed Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	A02	Baghouse
A07	Belt Conveyor	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	A11	Baghouse
Plant 4				
C41A	Belt Conveyor	391-3-1-.02(2)(e)	N/A	None
A08	Dryer	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	A09	Baghouse
A10	Belt Conveyor	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	A11	Baghouse
C21	Bucket Elevator			
A12	Belt Conveyor			
A14	No. 1 Midwestern Screen	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	A11	Baghouse
A55	Plant 8 Feed Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	A11	Baghouse
A19	VSI Feed Fines Bin			
A15	No. 3 Inside Bin			
A16	No. 2 Outside Bin			
A17	No. 2 Inside Bin			
A43	No. 1 Inside Bin	391-3-1-.02(2)(e)	N/A	None
A18	Hammer Mill Surge Bin	391-3-1-.02(2)(b)	A11	Baghouse
A20	Belt Conveyor C43	391-3-1-.02(2)(e)		
A22	Vertical Shaft Impact	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	A11	Baghouse
A26	Elevator			
A26A	Hopper			
A32	No. 2 Midwestern Screen			
A42	OZ Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	A11	Baghouse
A41	Z Truck Bin	391-3-1-.02(2)(e)	N/A	None
A46	Belt Conveyor	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	A11	Baghouse
A47	Pocket Conveyor			
A50	Hamer Packer Unit			
E47	Outside Bucket Elevator	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	A11	Baghouse
A59	Belt Conveyor	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	A11	Baghouse

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
A89	Plant 2 Feed Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	A94 F07	Baghouse Baghouse
A48	Belt Conveyor	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	A11	Baghouse
A49	Belt Conveyor			
A63	XO Rail Bin			
A64	XO Truck Bin	391-3-1-.02(2)(e)	N/A	None
A62	Inside XO Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	A11	Baghouse
A52	#3 Midwestern Screen	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	A11	Baghouse
A61	Inside 30-50 Bin	391-3-1-.02(2)(e)	N/A	None
A78	Raymond Separator	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	A11	Baghouse
A69	Rail Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	DC69	Bin Vent
A68	Truck Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	DC68	Bin Vent
A96	Belt Conveyor	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	A11	Baghouse
A97	Belt Conveyor			
A98	Belt Conveyor			
Plant 8				
D72	Plant 8 Feed Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	D71	Bin Vent
D74	Bucket Elevator	391-3-1-.02(2)(e)	N/A	None
D77	Surge Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F05	Baghouse
D78	Surge Bin			
D81	Tube Mill No. 1			
D82	Tube Mill No. 2			
D84	Bucket Elevator			
D85	Bucket Elevator			
D89	No. 1 Separator			
D88	No. 2 Separator			
E14	Feed Bin	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	M11	Bin Vent
E16	Air Sifter #1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	E17	Baghouse
E19	GS-80 Bin	391-3-1-.02(2)(e)	N/A	None
E21	Product Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	E20	Bin Vent
D95	Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	E09	Baghouse
D96	Bin			
D99	Tube Mill No. 3			
E01	Tube Mill No. 4			
E05	Bucket Elevator			
E02	Bucket Elevator			
E07	Separator			
E04	Separator			
E23	Silo Wingdale	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	E22	Bin Vent
E24	Load out Spout	391-3-1-.02(2)(e)	N/A	None
E34	Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	C65	Bin Vent
E35	Air Sifter No. 3	391-3-1-.02(2)(b)	E09	Baghouse
E36	Cyclone	391-3-1-.02(2)(e)		
E27	Silo 6451 Calwhite	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	E26	Baghouse

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
E37	Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	C66	Bin Vent
C16	Air Sifter No. 4	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	E09	Baghouse
D53	Cyclone			
E28	Silo Gamma Plast	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	F09	Bin Vent
E25	Silo 255 1043	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	E26	Baghouse
E30	Old Slurry Bin	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	M12	Bin Vent
E31	Loadout Spout	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	M13	Baghouse
Plant 5				
B10	Plant 5 - 52 Raymond Mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	B11	Baghouse
B9	Plant 5 - 52 Raymond Mill Cyclone			
B12	Plant 5 - 51 Raymond Mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	B13	Baghouse
B16	Plant 5 - 51 Raymond Mill Cyclone			
B36	Belt Conveyor	391-3-1-.02(2)(e)	N/A	None
B37	Belt Conveyor			
C12	Belt Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	N/A	None
C15	Belt Conveyor			
B14	Plant 5 - 53 Raymond Mill	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	B15	Baghouse
B17	Plant 5 - 53 Raymond Mill Cyclone			
F60	Bin	391-3-1-.02(2)(e)	N/A	None
F61	Super Sack Station	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	A11	Baghouse
B35	Belt Conveyor	391-3-1-.02(2)(e)	N/A	None
Plant 3				
B41	Feed Hopper	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	B40	Baghouse
B45	Feed Bin	391-3-1-.02(2)(e)	N/A	Wet Processes
B46	Feed Bin			
B47	Feed Bin			
B48	Feed Bin			
B53	Belt Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	N/A	Wet Process
B55	Belt Conveyor		N/A	Wet Process
B54	Surge Hopper	391-3-1-.02(2)(e)	N/A	Wet Process
B57	Shaker Screen	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	N/A	Wet Process
B58	Attrition Mill		N/A	Wet Process
B59	Screen Tank	391-3-1-.02(2)(e)	N/A	Wet Processes
B60	Feed Cone			
B61	FC Cyclone			
B64	Classifying Bird No. 1			
B63	Classifying Bird No. 2			
B65	Gamco 2 Screen			
B66	D2 Screen			
B71	Surge Hopper			
B74	Storage Tank			
B75	Metering Hopper			
B79	Imp Mill Flash Dryer	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g)	B80	Baghouse
B83	Gammaco Product Silo	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	B81	Bin Vent

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
B84	Inside Bin Silo 32	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	B82	Bin Vent
B98	D2T Product Silo	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	B97	Bin Vent
C1	CS11 Product Silo	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	B99	Bin Vent
C2	Micro Pulverizer	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	C9	Baghouse
C3	Transfer Hopper			
C4	CS-11 Packer Bin			
C11	CS-11 Bagger			
C5	CS-11 Truck Bin			
C6	Semi Bulk Bin	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	C8	Baghouse
C5A	Loading Station – Super Sack	391-3-1-.02(2)(b)	C9	Baghouse
C5B	Truck Loadout	391-3-1-.02(2)(e)		
C6A	Loading Station – Super Sack	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	C8	Baghouse
F67	400-200 Packer Bin	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F66	Bin Vent
F65	Surge Hopper	391-3-1-.02(2)(e)	N/A	None
B90	400-200 Parker Bin Packer	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	F62	Baghouse
B92	Belt Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	N/A	None
Plant 13				
E38	Dump Hopper	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	N/A	None
E39	Bucketed Belt Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	N/A	None
E40	Feed Bin	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	E88	Baghouse
E41	Belt Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	N/A	None
E43	Plant 13 - 24 Raymond Mill	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	E42	Baghouse
E44	Cyclone	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	E42	Baghouse
E45	200 Ton Silo	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	N/A	None
F73	Super Sack Loading Station	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	N/A	None
E82	100 Ton Truck Bin	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	E80	Bin Vent
E83	100 Ton Truck Bin			
E87	Test Bin	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	E86	Bin Vent
E87A	Loadout	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	N/A	None
E84 & E85	Rail & Truck Loading	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	E88	Baghouse
C651	Belt Conveyor	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	N/A	Covered Conveyor
BIN564	Raymond Mill Transfer Hopper	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	N/A	Open Top Hopper
BIN561	75 Ton Product Bin (A)	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	DC561	Baghouse
LOC561	Rail & Truck Loading (A)	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	LOC561	Baghouse

Emission Units		Specific Limitations/Requirements	Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	ID No.	Description
BIN562	75 Ton Product Bin (B)	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	DC562	Baghouse
LOC562	Rail & Truck Loading (B)			
BIN563	100 Ton Product Bin	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	DC563	Baghouse
LOC563	Rail & Truck Loading (B)			
BL517	Pneumatic Conveyor (A)	40 CFR 60 Subpart OOO 391-3-1-.02(2)(e)	DC561	Baghouses
BL518	Pneumatic Conveyor (B)		DC562	
		DC563		

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards are intended as a compliance tool and may not be definitive.

B. Equipment & Rule Applicability

Emission and Operating Caps:

Based on recent EPA regulations limiting nonroad diesel fuel to ultra-low-sulfur diesel of 99.5% or lower, Condition No. 3.2.1 restricts fuel oil burned to ensure compliance with Rule (g). Marble, Calcium carbonate (CaCO₃), is not regulated under 40 CFR Part 60 Subpart UUU, *Standards of Performance for Calciners and Dryers in Mineral Industries.*, therefore, the Dryer (E89) is subject to Rule (e). Condition 3.2.2 was originally meant to limit particulate matter emissions from the Dryer (E89) to avoid the applicability of 40 CFR 52.21, *Prevention of Significant Deterioration (PSD) of Air Quality*.

Rules and Regulations Assessment:

Most of the emission units in this plant are subject to Georgia Air Quality Control Rules 391-3-1-.02(2)(b), *Visible Emissions*, and 391-3-1-.02(2)(e), *Particulate Emissions from Manufacturing Processes*. Some equipment is subject to 40 CFR 60 Subpart OOO, *Standards of Performance for Nonmetallic Mineral Processing Plants*. Emission units burning fuel are subject to Georgia Rules 391-3-1-.02(2)(g), *Sulfur dioxide*.

C. Permit Conditions

Condition 3.2.1 requires use of distillate fuel oil only be fired in fuel burning sources.

Condition 3.2.2 contains PM emission limits for Rotary Dryer E89.

Condition 3.3.1 requires the Permittee to comply with NSPS Subpart A.

Condition 3.3.2 requires the Permittee to comply with NSPS OOO.

Condition 3.4.1 limits opacity to forty percent.

Condition 3.4.2 requires the Permittee to comply with Georgia Air Quality Control Rule 391-3-1-.02(2)(e), *Particulate Emissions from Manufacturing Processes*.

Condition 3.5.1 require baghouses to be operated at all times when the associated equipment is in use.

Condition 3.5.2 requires adequate inventory of replacement filter bags for baghouses.

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

Condition 4.2.1 addresses potential 40 CFR 60 Subpart OOO testing requirements.

Condition 4.2.2 addresses repeating Subpart OOO performance tests within 5 years, for fugitive emissions from affected facilities without water sprays (This applies only to equipment that commence construction, modification, or reconstruction on or after April 22, 2008).

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

Condition 5.2.1 addresses continuous temperature monitoring on the inlet of the baghouses controlling Rotary Dryer (E89), Dryer (A08) and Imp Mill Flash Dryer (B79).

Conditions 5.2.2 and 5.2.3 address baghouses visible emissions monitoring.

Condition 5.2.4 deals with monitoring emission units with no air pollution control devices.

Conditions 5.2.5 and 5.2.6 address 40 CFR 60 Subpart OOO additional monitoring for affected facilities constructed, modified or reconstructed on or after April 22, 2008.

C. Compliance Assurance Monitoring (CAM)

Under 40 CFR 64, the Compliance Assurance Monitoring Regulations (CAM), facilities are required to prepare and submit monitoring plans for certain emission units with the Title V application. Each emission unit controlled by a control device that *"has potential pre-control device emissions of the*

applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source," as defined by 40 CFR §64.2(a)(3) is subject to CAM.

The narrative for Air Quality Permit, No. 1499-227-0003-V-04-0, states that the facility has no equipment which is subject to CAM.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a Semiannual basis.

B. Specific Record Keeping and Reporting Requirements

Condition 6.2.1 contain record keeping and reporting requirements of 40 CFR 60 Subpart OOO.

Condition 6.2.2 requires the Permittee to verify fuel oil received is distillate oil.

Condition 6.2.3 contain recordkeeping provisions for fugitive emissions.

VII. Specific Requirements

A. Operational Flexibility

None applicable.

B. Alternative Requirements

None applicable.

C. Insignificant Activities

See Permit Application on GEOS website.
See Attachment B of the permit

D. Temporary Sources

None applicable.

E. Short-Term Activities

None applicable.

F. Compliance Schedule/Progress Reports

None applicable.

G. Emissions Trading

None applicable.

H. Acid Rain Requirements

None applicable.

I. Stratospheric Ozone Protection Requirements

None applicable.

J. Pollution Prevention

None applicable.

K. Specific Conditions

None applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//